

ALSTON & BIRD

90 Park Avenue
New York, NY 10016
212-210-9400 | Fax: 212-210-9444

Jenny Kramer

Direct Dial: 212-210-9420

Email: jenny.kramer@alston.com

June 27, 2023

VIA ECF

Hon. Diane Gujarati, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *U.S. v. Cherwitz et al.*, Case No. 23-cr-00146 (DG)

Dear Judge Gujarati:

With the consent of the Government, we write on behalf of Rachel Cherwitz to respectfully request that the Court modify Ms. Cherwitz's Conditions of Release (ECF 19).

On June 20, 2023, Ms. Cherwitz was presented and arraigned before Magistrate Judge Cheryl L. Pollak and released pursuant to bail conditions, including a condition prohibiting her from traveling outside of New York City or the Northern District of California except for travel to and from the Court. ECF 19, ¶ 7(d). Both Pretrial Services and the Government consent to a modification of that restriction to also allow for travel within the Continental United States, provided that notice is provided in advance of any such travel.

Respectfully submitted,

/s/ Jenny Kramer

Jenny Kramer
ALSTON & BIRD LLP
90 Park Avenue
New York, NY 10016
(212) 210-9420
Jenny.Kramer@alston.com

Attorney for Rachel Cherwitz